Commissioner Phil Guidice
Department of Energy Resources
Commonwealth of Massachusetts
100 Cambridge Street
Suite 1020
Boston, MA 02114
Sent via electronic mail to doer.biomass@state.ma.us

RE: Manomet Biomass Sustainability and Carbon Policy Study

August 5, 2010

Dear Commissioner Guidice,

Thank you for the opportunity to comment on the Biomass Sustainability and Carbon Policy Study, directed by the Manomet Center for Conservation Sciences. As a co-founder and CEO of WoodPellets.com, the nation's leading independent distributor and direct-to-consumer provider of wood pellet heating fuel, **I was extraordinarily pleased to see the Commonwealth of Massachusetts actively investigate the benefits of renewable thermal energy.**

I have read the comments provided by several scientific and industry thought leaders who have questioned some of the assumptions underpinning the study. Given the issues raised, we support addressing these concerns with additional scientific scrutiny. However, in the interest of being constructive, I will leave the scientific arguments to the scientific community and use this opportunity for comment to focus on the implications of this study for the thermal biomass industry.

The essential conclusion of your study that "the use of biomass for heating and combined heat and power (CHP) facilities would result in a 25 percent reduction in greenhouse gas emissions in 2050 relative to oil" offers further evidence that using renewable biomass to generate heat is the cleanest, most efficient use of our biomass resources.

Homeowners have a tremendous opportunity to decrease greenhouse gas emissions, to reduce our dependence on foreign oil, and to save on their heating costs by using wood pellets for heating. In a world where BP's recent oil spill has made us only too aware of the environmental hazards of oil, consumers and businesses can switch to a safe, domestically produced alternative today. From high efficiency heating appliances to sustainably harvested fuel and convenient fuel delivery systems, all the pieces are in place for the renewable heating revolution and we invite the Commonwealth to join us in this thermal clean energy movement.

Thermal energy accounts for roughly one-third of the total energy used in the US. Europe has proven that biomass can replace oil heat and displace carbon emissions using clean, low emission, high efficiency appliances which are available in the market today. **To fully confront our nation's energy crisis and reduce greenhouse gas emissions, a comprehensive policy must address the thermal sector, not only the electric and transportation sectors.** As you develop policy recommendations in response to this study, I ask that you consider the development of a Renewable Thermal Standard to address the heating sector. A Renewable Thermal Standard (RTS) that rewards the production of thermal energy from renewable sources could be fashioned in a similar way to the Renewable Fuels Standard for transportation fuels and the proposed National Renewable Electricity Standard for electricity generation. By requiring a minimum percentage of thermal energy generated in the state to be obtained from renewable sources, the RTS would drive new and greater investment in the biomass thermal industry and reduce greenhouse gas emissions.

Investing in the thermal energy sector will not only slash our greenhouse gas emissions, it will also lower energy costs for homeowners and businesses. Thermal biomass is a large, and growing, renewable energy solution that provides an economical, environmental and sustainable alternative to high carbon fuels like heating oil. Consumers who switch from heating oil to wood pellet fuel can save hundreds of dollars in annual energy costs. The average homeowner heating with wood pellet fuel spends only $750 a year on heating fuel, compared to more than $2,000 a year to heat that same home with heating oil.[i]

But consumers are not the only ones who can save on their heating costs. In Massachusetts alone, state and federal agencies contributed over $233 million to providing heating fuel assistance in 2008. Nationwide, fuel assistance programs in 2010 totaled over $5.1 billion, with an enormous share of those expenditures supporting oil purchases. By spending hundreds of millions of dollars of public funds annually to finance the continued dominance of fossil fuel heating systems, LIHEAP and state fuel assistance programs are essentially enabling our nation's addiction to heating oil. Thermal biomass is a cleaner, low carbon alternative that would actually provide greater heat for struggling homeowners with a much higher return for the Commonwealth.

Today, we are calling for Massachusetts to lead New England's transition to clean, renewable, locally produced, and carbon neutral heating fuels by using a portion of our heating assistance program funds to enable the transition. This switch could provide heat at a lower cost, effectively enabling LIHEAP to provide coverage for more families across the state. 39% of Massachusetts homes are heated with heating oil, compared to a national average of just 9%. Those homes consumed 15,253,000 barrels of oil in 2008, and emitted 14 billion tons of C02.[ii] The Manomet study found that heating with renewable biomass instead of heating oil will

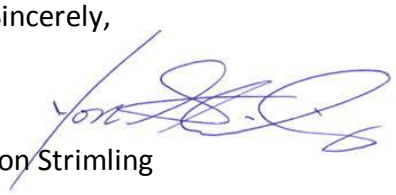
reduce greenhouse gas emissions by 25%. With the second highest residential fuel oil consumption in the nation, Massachusetts can slash greenhouse gas emissions by helping consumers make the switch from fossil fuels to renewable biomass fuels.

The thermal biomass industry is ripe for enormous growth and job creation, because unlike wind and solar industries where there are few post-construction jobs, biomass heating requires ongoing distribution of the fuel. Europe has seen incredible growth in the renewable thermal sector over the last decades, thanks to well-designed government programs. In Germany, strategic government incentives have generated 96,000 jobs in the biomass industry, more than in the renewable electric technologies like wind or solar.

WoodPellets.com applauds your desire to "begin the process of refining our renewable energy regulations to provide incentives only for biomass energy that truly reduces our greenhouse gas emissions and protects our forests."[iii] More than two million families in the U.S. already heat their homes with wood pellets or biomass fuels. Thermal biomass appliances are currently eligible for many clean energy tax credits and incentives, including a 30% federal tax credit, up to $1,500, for qualifying biomass stoves. With your leadership at the state level, Massachusetts' strategic investment in this sector will help millions of homeowners make the switch to clean, green heat, creating hundreds of thousands of jobs and keeping energy dollars in our communities.

I would welcome the opportunity to further discuss opportunities in thermal biomass at your earliest convenience.

Sincerely,



Jon Strimling

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[i] http://www.woodpellets.com/support/save-money-woodpellets.aspx

[ii] U.S. Energy Information Administration, Independent Statistics and Analysis, State of Massachusetts, updated Jan. 2010. : http://tonto.eia.doe.gov/state/state_energy_profiles.cfm?sid=MA

[iii] Press Release, Massachusetts Department of Energy Resources, "Patrick-Murray Administration Releases Biomass Sustainability Study," June 10, 2010